IN THE DISTRICT COURT OF THE UNITED STATES FOR THE DISTRICT OF SOUTH CAROLINA SPARTANBURG DIVISION

Blockquarry Corp. f/k/a ISW Holdings, Inc.,	C/A No.: 7:23-cv-01427-TMC
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Plaintiff,

v.

Litchain Corp. and Gaffney Board of Public Works,

Defendants.

Gaffney Board of Public Works,

Counter-/Cross-Claimant,

v.

Blockquarry Corp. f/k/a ISW Holdings, Inc., Counterclaim Defendant, and Litchain Corp.,

Crossclaim Defendant.

UNOPPOSED MOTION
TO WITHDRAW COUNSEL

The undersigned moves, pursuant to Local Civ. Rule 83.I.07(A) (D.S.C.), for withdrawal of the appearance and representation of William A. Neinast as counsel for Plaintiff Blockquarry Corp. f/k/a ISW Holdings, Inc. ("Plaintiff") and shows the following.

- 1. On April 7, 2023, the undersigned and William A. Neinast filed, on behalf of Plaintiff, the underlying Complaint.
- 2. Since that time, William A. Neinast has left the employment of Fox Rothschild LLP. The undersigned remains employed by Fox Rothschild LLP.
- 3. Plaintiff consents to the withdrawal of William A. Neinast's appearance on behalf of and representation of Plaintiff in this matter.

- 4. The undersigned, as the attorney who will remain as counsel for Plaintiff, consents to the withdrawal of William A. Neinast's appearance on behalf of and representation of Plaintiff in this matter.
- 5. William A. Neinast consents to the withdrawal of his appearance and representation of Plaintiff in this matter.

COMPLIANCE

6. Pursuant to Local Civ. Rule 7.02, the undersigned affirms and certifies that prior to the filing of this motion, he conferred with Defendant/Counter-Claimant Gaffney Board of Public Works' ("Gaffney BPW") counsel. Gaffney BPW consent to the relief requested hereby.

CONCLUSION

The undersigned respectfully requests that William A. Neinast's appearance and representation in this matter be withdrawn, leaving the undersigned as Plaintiff's sole counsel of record in this matter.

Respectfully submitted,

November 16, 2023	FOX ROTHSCHILD LLP
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Greenville, South Carolina	/s/ R. Taylor Speer R. Taylor Speer Federal ID# 12267 tspeer@foxrothschild.com
150140388	Attorneys for Blockquarry Corp. f/k/a ISW Holdings, Inc.